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Painesville Office  
 June 20, 2025

**MEMO ENDORSED**

VIA CM/ECF

Hon. Jessica G. L. Clarke  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007-1312

**RE: *Pini v. Sullivan County*, Case No. 7:25-cv-02194-JGLC  
 Letter Motion and Notice to Court re: Service Issue and Upcoming Dates**

Dear Judge Clarke:

On March 17, 2025, Plaintiffs filed this action, concurrently requesting this matter been administratively related to *Cavaluzzi et al. v. Sullivan County*, Case No. 1:23-cv-11067-PAE as Plaintiffs' claims in both cases purport to seek recovery for the same conduct against the same defendant, except this matter seeks relief for a Rule 23 putative class. However, Judge Engelmayer (the Judge presiding over the *Cavaluzzi* matter) denied such request. Subsequently on June 11, 2025, Electronic Summons was issued as to Defendant Sullivan County. Doc. 12. However, that summons has not reached Defendant as of yet.

Plaintiffs have been in contact with counsel for Defendant in the *Cavaluzzi et al. v. Sullivan County*, Case No. 1:23-cv-11067-PAE matter, who have confirmed they will be counsel for Defendant in the present matter. As such, they are generally aware of the case, but will not accept service for Defendant Sullivan County. As a result, service has not been perfected.

Therefore, the undersigned respectfully requests the dates set by the Court's Order of Doc. 5 for a) the meet and confer, submission of a joint letter with a joint proposed Civil Case Management Plan and Scheduling Order, and b) subsequent Initial Pretrial

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Conference with the Court (June 23, 2025 and June 30, 2025, respectively) be adjourned and re-set pending effectuation of service (which will be accomplished shortly).

Respectfully submitted,

/s/ Patrick J. Brickman  
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*One of Counsel for Plaintiffs*

cc: All Counsel of Record via ECF

Application GRANTED. The conference on June 30, 2025 and deadlines for related submissions are ADJOURNED *sine die*. The Clerk of Court is directed to terminate ECF No. 13.

SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge  
Dated: June 23, 2025  
New York, New York